

EXHIBIT 51

Redacted Excerpts of Deposition of Sean Shelby

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF SEAN SHELBY

Las Vegas, Nevada

April 12, 2017

9:11 a.m.

Reported By:
Gale Salerno, RMR, CCR No. 542
Job No. 49972

SEAN SHELBY - CONFIDENTIAL

118	120
<p>1 (Exhibit 7 was marked for 2 identification.) 3 BY MR. MADDEN: 4 Q. You've been handed what's been marked as 5 Exhibit 7. It's another text compilation between -- 6 well, it's a text compilation that includes multiple 7 parties, but it's not group text, if you understand 8 what I'm saying. 9 A. Uh-huh. 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>
119	121
<p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>	<p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 [REDACTED] 12 [REDACTED] 13 [REDACTED] 14 [REDACTED] 15 [REDACTED] 16 [REDACTED] 17 [REDACTED] 18 [REDACTED] 19 [REDACTED] 20 [REDACTED] 21 [REDACTED] 22 [REDACTED] 23 [REDACTED] 24 [REDACTED] 25 [REDACTED]</p>

31 (Pages 118 to 121)

SEAN SHELBY - CONFIDENTIAL

270	272
1 for today, but I will be holding the deposition open	1
2 because of the state of the text messages as produced	2 STATE OF _____)
3 and the lack of information for the senders and	3) :ss
4 recipients of not only some of the texts I discussed	4 COUNTY OF _____)
5 today, but also additional texts that were not	5
6 discussed potentially in part because of the lack of	6
7 that information, and in addition, based on the	7 I, SEAN SHELBY, the witness
8 recent production of the privilege log, which we have	8 herein, having read the foregoing
9 not yet had an opportunity to review and/or challenge	9 testimony of the pages of this deposition,
10 entries that may be applicable to Mr. Shelby.	10 do hereby certify it to be a true and
11 MR. WIDNELL: Okay. And let the record	11 correct transcript, subject to the
12 reflect that at this point you have already used more	12 corrections, if any, shown on the attached
13 than seven hours of time. Thank you.	13 page.
14 THE COURT REPORTER: Before we go off the	14
15 record, may I ask you, Mr. Widnell, on the record	15
16 your transcript order?	16 SEAN SHELBY
17 MR. WIDNELL: If we could get a rough as	17
18 soon as possible, and then a full and miniscript in	18
19 the regular time period that you use.	19
20 THE COURT REPORTER: Thank you.	20 Sworn and subscribed to before
21 THE VIDEOGRAPHER: This concludes today's	21 me, this day of
22 deposition by Sean Shelby. The number of media used	22 , 2017.
23 was seven videotapes.	23
24 We are now off the record, and the time	24
25 approximately 6:09 p.m.	25 Notary Public
271	273
1 (A discussion was held off the record.)	1 CERTIFICATE OF REPORTER
2 MR. WIDNELL: Let's put on the written	2 STATE OF NEVADA)
3 record one key point that we're designating the	3 SS:
4 transcript confidential, pending confidentiality	4 COUNTY OF CLARK)
5 designations?	5 I, GALE SALERNO, a certified court
6 And then I'm sorry, what was your other	6 reporter, do hereby certify:
7 question?	7 That prior to being examined, the witness
8 THE COURT REPORTER: Read and sign?	8 in the foregoing proceedings was by me duly sworn to
9 MR. WIDNELL: Yes, we will read and sign.	9 testify to the truth, the whole truth, and nothing
10 - - -	10 but the truth;
11 (The videotaped deposition was	11 That said proceedings were taken before me
12 adjourned at 6:10 p.m.)	12 at the time and place therein set forth and were
13 - - -	13 taken down by me in shorthand and thereafter
14	14 transcribed into typewriting under my direction and
15	15 supervision; and that transcript review was requested
16	16 pursuant to NRCP 30(e.)
17	17 I further certify that I am neither counsel
18	18 for nor related to any party to said proceedings, and
19	19 that I am not anyway interested in the outcome
20	20 thereof.
21	21 IN WITNESS WHEREOF, I have hereunto
22	22 subscribed my name this 26th day of April, 2017.
23	23
24	24 GALE SALERNO, RMR, CCR #542
25	25

SEAN SHELBY - CONFIDENTIAL

<p>1 INSTRUCTIONS TO WITNESS</p> <p>2</p> <p>3 Please read your deposition over carefully</p> <p>4 and make any necessary corrections. You should state</p> <p>5 the reason in the appropriate space on the errata</p> <p>6 sheet for any corrections that are made.</p> <p>7 After doing so, please sign the errata sheet</p> <p>8 and date it.</p> <p>9 You are signing same subject to the changes</p> <p>10 you have noted on the errata sheet, which will be</p> <p>11 attached to your deposition.</p> <p>12 It is imperative that you return the original</p> <p>13 errata sheet to the deposing attorney within thirty</p> <p>14 (30) days of receipt of the deposition transcript by</p> <p>15 you. If you fail to do so, the deposition transcript</p> <p>16 may be deemed to be accurate and may be used in court.</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	274	
<p>1 E R R A T A</p> <p>2</p> <p>3</p> <p>4</p> <p>5 I wish to make the following changes,</p> <p>6 for the following reasons:</p> <p>7</p> <p>8 PAGE LINE</p> <p>9 ____ CHANGE: _____</p> <p>10 REASON: _____</p> <p>11 ____ CHANGE: _____</p> <p>12 REASON: _____</p> <p>13 ____ CHANGE: _____</p> <p>14 REASON: _____</p> <p>15 ____ CHANGE: _____</p> <p>16 REASON: _____</p> <p>17 ____ CHANGE: _____</p> <p>18 REASON: _____</p> <p>19 ____ CHANGE: _____</p> <p>20 REASON: _____</p> <p>21</p> <p>22</p> <p>23 _____</p> <p>24 WITNESS' SIGNATURE DATE</p> <p>25</p>	275	

70 (Pages 274 to 275)